

JLS:coo

AO 91 (Rev. 11/11) Criminal Complaint

2025R00161

UNITED STATES DISTRICT COURT  
for the  
District of Minnesota

UNITED STATES OF AMERICA

v.

MICHAEL BRUCE GILLIS,

**FILED UNDER SEAL PURSUANT  
TO 18 U.S.C. § 3509(d)(2) and L.R.  
49.1(c)(1)(G)**

Case No. 25-mj-143 (SGE)

**CRIMINAL COMPLAINT**

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

**Count 1**

On or about March 2, 2025, in the State and District of Minnesota, the defendant, using a facility and means of interstate and foreign commerce—namely, using his cell phone, computer, and the Internet—attempted to and did knowingly persuade, induce, entice, and coerce Minor Victim A, who had not yet attained the age of 18 years, to engage in sexual activity which under such circumstances would constitute a criminal offense—namely the production and attempted production of child pornography in violation of Title 18, United States Code, Section 2251(a) and Criminal Sexual Conduct in the Third Degree in violation of Minnesota Statute—all in violation of Title 18, United States Code, Sections 2422(b) and 2427.

**Count 2**

On or about March 2, 2025, in the State and District of Minnesota, the defendant, did employ, use, persuade, and entice Minor Victim A to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, as described below, which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and which visual depiction was actually transported and transmitted using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce—namely, a photograph depicting the erect penis of Minor Victim A and a photograph depicting the exposed anus of Minor Victim A—all in violation of Title 18, United States Code, Section 2251(a) and 2251(e).

I further state that I am a Task Force Officer (TFO) with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

  
\_\_\_\_\_  
*Complainant's signature*

SUBSCRIBED and SWORN before me  
by reliable electronic means (FaceTime and email)  
pursuant to Fed. R. Crim. P. 41(d)(3).

Task Force Officer Kevin Brown  
Federal Bureau of Investigation  
\_\_\_\_\_  
*Printed name and title*

Date: March 20, 2025

  
\_\_\_\_\_  
*Judge's Signature*

City and State: St. Paul, MN

The Honorable Shannon G. Elkins  
United States Magistrate Judge  
\_\_\_\_\_  
*Printed Name and Title*